UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD SUBREGION 33

RIVERSTONE GROUP, INC.)
Employer,)
and)
NICHOLAS ALLEN BROLINE,)
Petitioner,) Case No. 25-RD-138605
and)
INTERNATIONAL UNION OF)
OPERATING ENGINEERS, LOCAL)
UNION NO. 150,)
Union.)
Omon.)

RESISTANCE TO IUOE LOCAL 150'S REQUEST FOR AN EXTENSION OF TIME TO FILE A REQUEST FOR REVIEW

NOW COMES CORDOVA DREDGE, a Division of RiverStone Group, Inc. ("Cordova Dredge"), by and through its attorneys, Califf & Harper, P.C., and for its resistance to IUOE Local 150's request for an extension of time to file a request for review of the Decision and Direction of Election, states as follows:

- 1. Local 150's request is plainly part of a pattern that it has followed in taking action that has delayed election proceedings.
- 2. Most recently in this case, Local 150 filed its Request for Extension of Time to File Post Hearing Brief on Tuesday, October 28, 2014.
- 3. RiverStone Group, Inc. ("Employer") filed its Resistance to IUOE Local 150's Request for Extension of Time to File Post Hearing Brief on October 29, 2014 and delay was

avoided by the NLRB's denial of request for extension of time on October 29, 2014 the same day the Employer filed its resistance.

- 4. Local 150's Request for Extension of Time to File Post Hearing Brief cited nonemergency circumstances and typical attorney work assignments as the basis of its request.
- 5. Local 150's request for extension of time to file a request for review of the Decision and Direction of Election is more of the same. Once again, the Union cites non-emergency circumstances and typical attorney work assignments as the basis for its request.
- 6. For the reasons stated above, it is respectfully submitted that the Union's request for an extension of time to file a request for review for the Decision and Direction of Election should be denied and the request for review remain due on or before December 4, 2014.

CORDOVA DREDGE, Employer

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PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the following individuals by email on the November 25, 2014:

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